

## I.0 FINAL EIR INTRODUCTION

### I.1 Organization of Final EIR

This document comprises Volume A of the Final EIR for the proposed Salvation Army Divisional Camp and Retreat Expansion Project (P70-379W2). As required by Section 15132 of the CEQA Guidelines, the Final EIR consists of the following elements:

Document	Description
Final EIR Volume A	Main body of EIR consisting of the original February 2005 Draft EIR as subsequently revised by the April 2008 Revised Draft EIR, and revisions as a result of responses to comments received on the February 2005 Draft EIR and the April 2008 Revised Draft EIR.
Final EIR Volume B – Responses to Comments	Volume B contains the comments and responses to comments prepared for the February 2005 Draft EIR and the April 2008 Revised Draft EIR.
Final EIR Technical Appendices – Volume I	<ul style="list-style-type: none"> <li>- Appendix A – Notice of Preparation</li> <li>- Appendix B - Biological Report</li> <li>- Appendix C - Noise Analysis</li> <li>- Appendices D1 through D3 - Cultural Resources Reports</li> </ul>
Final EIR Technical Appendices – Volume II	<ul style="list-style-type: none"> <li>- Appendix E - Traffic Analysis</li> <li>- Appendix F - Mussey Grade Road/CRHR Memo</li> <li>- Appendix G - Stormwater Analysis</li> <li>- Appendix H - Public Service Letters</li> <li>- Appendix I – Fire Protection Plan/Emergency Procedures</li> <li>- Appendix J - Water System Evaluation</li> <li>- Appendix K - Waste Water Disposal Systems Design</li> </ul>

### I.2 Background

#### Notice of Preparation

The California Environmental Quality Act (CEQA) EIR process for the proposed Salvation Army Divisional Camp and Retreat began with the issuance of the Notice of Preparation (NOP) of an EIR on March 16, 2000. The NOP was provided to certain public agencies and members of the public and was published in the newspaper. Eleven letters were received during the NOP scoping period (March 16, 2000 to April 14, 2000) from the public and various agencies.

**February 2005 Draft EIR (DEIR).** In February 2005, the County of San Diego Department of Planning and Land Use (DPLU) published the Salvation Army Divisional Camp and Retreat Draft Environmental Impact Report (DEIR) (SCH#2000031058, County DPLU Case #'s ER98-14-023, P70-379W2). The DEIR was circulated for public review and comment for a period of 45 days ending on March 28, 2005. During the course of the DEIR public review period, 16 written comment letters were received regarding the content and adequacy of the DEIR. The County reviewed these comments and determined that additional analysis was warranted with respect to fire protection and biological resources in order to adequately respond to comments received on the DEIR.

**April 2008 Revised Draft EIR (RDEIR).** In response to comments received on the February 2005 Draft EIR, additional analysis was performed regarding fire protection and biological resources. The County determined that the additional analysis constituted "significant new information" and therefore, recirculation of portions of the Draft EIR was required pursuant to CEQA Guidelines §15088.5. The April 2008 Revised Draft EIR was circulated for public review between April 24, 2008 and June 9, 2008. During the course of the RDEIR public review period, 12 written comment letters were received regarding the content and adequacy of the RDEIR.

The following provides a description of the significant new information that was added to the EIR after public review of the DEIR (February 10, 2005).

**1. 2005 Draft EIR "Preferred Project" No Longer Under Consideration.** The DEIR assessed the potential environmental impacts of implementing the "Preferred Project," which would expand the camp and retreat facilities to accommodate a maximum of 748 users (DEIR Chapter 1 – Project Description, Location and Environmental Setting). However, the DEIR analysis identified significant and unmitigated impacts associated with the "Preferred Project" related to conflicts with the MSCP (Biological Resources) and the General Plan Conservation Element (Land Use). Because there are alternatives to the "Preferred Project" that can avoid these unmitigated impacts, Reduced Project Alternative I is the project that will be carried forward to the decision makers for consideration (2005 DEIR pages 5-3, 5-4, 4-5, 4-6, 4-7).

The Reduced Project Alternative I would reduce the size of the Education Camp. The proposed Multi-Purpose building would remain at 19,500 square feet and would serve as the Shelter-in-Place structure. This alternative would also reduce the retreat component and eliminate the yurt camp and a presentation area. Overall, Reduced Project Alternative I would reduce the building footprint by 11,150 square feet, reduce the vegetation impacts by approximately nine acres and reduce maximum occupancy by 133 users.

**2. Modification of Staff Housing Component of Site Plan.** The proposed staff housing component of the site plan was modified from the DEIR and shown in the RDEIR (referred to as Area 1, DEIR Figures 1-5 and 1-6). In responding to the public comments on the DEIR, the previously proposed location of two staff housing buildings was changed to ensure that the 25-foot buffer from previously identified County Resource Protection Ordinance (RPO) wetlands would be maintained in that portion of the project site. This change would shift the two housing buildings 25 feet to the east. After this modification was implemented, the County amended the RPO. As a result of this amendment, the affected drainages are no longer classified as RPO wetlands, essentially negating the need for the project modification. However, this configuration

has been maintained and no additional impact would result because the buildings would be relocated in an area already assumed to be impacted. These buildings are labeled “6” on the site plan.

**3. Open Space Easement.** In response to a written comment submitted on the 2005 Draft EIR by the Endangered Habitats League (dated February 14, 2005), the proposed open space easement was substantially increased and reconfigured. As previously proposed, the open space easement covered 109 acres. Under the Applicant’s Preferred Project, the revised open space easement would cover 278.80 acres, a net increase of 169.8 acres. Under the Reduced Project Alternative I, the open space easement covers 395.57 acres, a net increase of 286.57 acres over the amount originally proposed in the February 2005 Draft EIR.

To comply with the County’s Biological Mitigation Ordinance (BMO) Preserve Design Criteria (goals and criteria #4), the project’s proposed open space easement has been revised to increase the amount of preserved area and decrease the amount of edge, and provide greater connectivity through the project site and with off-site preserve lands (thereby reducing non-preserve edge). The revised open space configuration creates more significant blocks of preserved habitat to reduce edge effects and to maximize the ratio of the area to the perimeter of conserved habitats, while providing connectivity with off-site preserved lands, ensuring compliance with the MSCP Preserve Design Criteria. The revised open space configuration maximizes the habitat structural diversity of conserved habitat areas. This revised easement configuration also conserves more habitat than is required for habitat-based mitigation, resulting in a net preservation gain in preservation over development.

**4. County Amended Resource Protection Ordinance (RPO).** In March 2007, the County Board of Supervisors approved amendments to the RPO. The amendments included a change to the definition of “wetlands” and wetland buffering (i.e., setback) requirements. The revised definition of a wetland is less inclusive than the prior definition. As a result, some areas of the project site that were previously delineated in the DEIR as County RPO jurisdictional wetlands no longer qualify as RPO wetlands, and therefore, are no longer subject to the RPO restrictions on development in wetlands and wetland buffers. However, no changes to the proposed project were made in response to the reclassification of wetlands on the project site.

**5. Salvation Army Divisional Camp Conceptual Fire Protection Plan.** DPLU required a Fire Protection Plan (FPP) to be prepared for the proposed project. The FPP describes the fire safety requirements of the Fire Authority(ies) Having Jurisdiction (FAHJ) over the project – the Ramona Fire Department and the San Diego County DPLU Fire Marshals. The FPP includes a combined fire protection system designed for structures on the project site. The fire protection system includes, but is not limited to, customized fuel modification zones; enhanced, ignition-resistant construction; water tank and pipeline improvements; interior sprinklers; and other infrastructure improvements.

**6. Increased Biological Impacts Associated with Alternative I.** The newly proposed fuel modification zones identified in the FPP expanded the vegetation clearing requirements at several locations from what was previously assumed in the DEIR for Reduced Project Alternatives I and II. This expansion increased the vegetation impacts for Reduced Project Alternatives I and II, compared to the impacts identified in the February 2005 DEIR. The areas where the fuel modification zones have been expanded to reflect fire protection requirements were identified and analyzed in the RDEIR.

## I.3 Summary of Revisions

The following provides a summary of the revisions made to the EIR after the February 2005 DEIR and the April 2008 RDEIR were circulated for public comment. These changes have been incorporated into the Final EIR. All changes made as part of the Final EIR (since the public review periods for the February 2005 DEIR and the April 2008 RDEIR) are shown in underline (text additions) or ~~strikeout~~ (text deletions).

EIR Section or Chapter	Summary of Revision
<b>S.O Summary</b>	<ol style="list-style-type: none"> <li>1. Clarification that Reduced Project Alternative I is being carried forward to the decision makers for consideration of approval.</li> <li>2. Impact and mitigation summary updated to reflect revisions shown in environmental analysis section. The primary change is the differentiation of impacts and mitigation measures associated with the Applicant's Preferred Project and Reduced Project Alternative I.</li> </ol>
<b>1.0 Project Description and Environmental Setting</b>	<ol style="list-style-type: none"> <li>1. Reference to the previously proposed 260,000-gallon water storage tank has been revised to a 650,000-gallon tank (expandable to 800,000 gallons) based on the updated Water System Evaluation (RMWD, 2009).</li> <li>2. The section has been annotated to indicate where project features would be modified or eliminated with implementation of Reduced Project Alternative I (see Final EIR Introduction).</li> <li>3. Reference has been added to the large-scale fold-out plan of Reduced Project Alternative I that is provided in Attachment A of the Final EIR.</li> <li>4. Section 1.1.1.2 Major Use Permit Conditions has been updated to be consistent with the proposed Major Use Permit (MUP) modification.</li> <li>5. Section 1.3.1 Matrix of Project Approvals/Permits has been amended to include additional actions associated with LAFCO annexation.</li> </ol>
<b>2.0 Significant Environmental Effects</b>	
<b>2.1 Geology/Soils</b>	<ol style="list-style-type: none"> <li>1. This section has been annotated to indicate where project features would be modified or eliminated with implementation of Reduced Project Alternative I.</li> <li>2. The Conclusions section was expanded to provide more explanation as to how impacts will be mitigated to a level less than significant.</li> </ol>
<b>2.2 Biological Resources</b>	<ol style="list-style-type: none"> <li>1. Clarification that certain impacts associated with the Applicant's Preferred Project would be</li> </ol>

	<p>avoided with implementation of Reduced Project Alternative I.</p> <ol style="list-style-type: none"> <li>Clarification that the project site is not located within a Biological Resource Core Area.</li> <li>Inclusion of updated biology surveys that were conducted in 2009 and verify the existing conditions biological conditions.</li> <li>Explanation that the impacts associated with the Applicant's Preferred Project do not account for the expanded fuel modification zones required by the FPP since the Applicant's Preferred Project will not be carried forward to the decision makers. The impacts associated with expanded fuel modification zones were assessed only for Reduced Project Alternatives I and II.</li> <li>The section was annotated to clarify the vegetation impacts and associated mitigation measures for Reduced Project Alternative I.</li> <li>The Conclusions section was expanded to provide more explanation as to how impacts will be mitigated to a level less than significant.</li> </ol>
<b>2.3 Hazards and Hazardous Materials</b>	<ol style="list-style-type: none"> <li>Fire Code References have been updated to reflect the County's 2009 Consolidated Fire Code</li> <li>The section was updated to reflect the updated and approved Fire Protection Plan (Dudek, 2010) that includes more stringent fire safety requirements, such as the provision of an On-Site Fire Safety Coordinator</li> <li>The water tank size and water infrastructure improvements have been updated to reflect the RMWD 2009 Water System Evaluation.</li> <li>The traffic evacuation analysis has been deleted.</li> <li>The Conclusions section was expanded to provide more explanation as to how impacts will be mitigated to a level less than significant.</li> </ol>
<b>2.4 Noise</b>	<ol style="list-style-type: none"> <li>This section was updated to reflect the County's current General Plan Noise Element policies and the County's current Noise Ordinance.</li> <li>The Conclusions section was expanded to provide more explanation as to how impacts will be mitigated to a level less than significant.</li> </ol>
<b>2.5 Aesthetics</b>	<ol style="list-style-type: none"> <li>Clarification that certain impacts associated with the Applicant's Preferred Project would be avoided with implementation of Reduced Project Alternative I.</li> </ol>

	<ol style="list-style-type: none"> <li>Reference to the water storage tank size has been changed from the originally proposed 260,000-gallon water tank to the currently proposed 650,000-gallon tank (expandable to 800,000-gallons) as a result of comments received from the Ramona Municipal Water District (RMWD) on the RDEIR (April 2008) and the subsequent Water System Evaluation (RMWD, July 7, 2009).</li> <li>County Light Pollution code reference updated to County Code section 51.201 et seq.</li> </ol>
<b>2.6 Cultural Resources</b>	<ol style="list-style-type: none"> <li>This section was updated to explain that County Code section 87.429 Human Remains or Native American Artifacts would apply to grading on the site.</li> <li>The Conclusions section was expanded to provide more explanation as to how impacts will be mitigated to a level less than significant.</li> </ol>
<b>2.7 Land Use Planning</b>	<ol style="list-style-type: none"> <li>Clarification that certain impacts associated with the Applicant's Preferred Project would be avoided with implementation of Reduced Project Alternative I.</li> <li>Clarification of the TIF Fee.</li> <li>Certain goal consistency analysis updated to reflect the Fire Protection Plan requirements.</li> </ol>
<b>3.0 Cumulative Impacts</b>	<ol style="list-style-type: none"> <li>Section 3.1.3 Hazards and Hazardous Materials was updated to reflect the 2009 Consolidated Fire Code.</li> <li>Section 3.1.8 Air Quality was updated to address climate change.</li> <li>Section 3.1.9 Hydrology/Water Quality was updated to reflect the updates provided in the November 2009 Storm Water Management Plan (Final EIR Appendix G).</li> <li>Section 3.1.10 Transportation/Traffic was updated to reflect the updates provided in the December 22, 2009 Traffic Report (Final EIR Appendix E). Also, this section was updated to include payment of TIF as required mitigation for cumulative traffic impacts.</li> <li>Section 3.1.10 The Conclusions section was expanded to provide more explanation as to how impacts will be mitigated to a level less than significant.</li> </ol>
<b>4.0 Project Alternatives</b>	<ol style="list-style-type: none"> <li>Clarification is provided regarding the biological impacts associated with Reduced Project</li> </ol>

	<p>Alternative I and Reduced Project Alternative II.</p> <p>2. The size of the multipurpose building would remain at 19,500 square feet under Reduced Project Alternative II as it is the proposed shelter-in-place structure.</p> <p>3. Clarification that, although previously rejected by the Applicant, Reduced Project Alternatives I and II remain under consideration.</p>
<b>5.0 Long-Term Environmental Effects</b>	<p>1. The water storage tank size has been changed from the originally proposed 260,000-gallon water tank to the currently proposed 650,000-gallon tank (expandable to 800,000-gallons) as a result of comments received from the Ramona Municipal Water District (RMWD) on the RDEIR (April 2008) and the subsequent Water System Evaluation (RMWD, July 7, 2009). The corresponding analysis of growth-inducing impacts has been revised accordingly.</p> <p>2. Water infrastructure improvements have been updated as a result of comments received from the Ramona Municipal Water District (RMWD) on the RDEIR (April 2008) and the subsequent Water System Evaluation (RMWD, July 7, 2009).</p>
<b>6.0 Environmental Effects Found Not to Be Significant</b>	
<b>6.1 Effects Found not to be Significant as Part of the EIR Process</b>	
6.1.2 Utilities/Service Systems	Section 6.1.2 Utilities/Service Systems was updated to reflect the updated Water System Evaluation (RMWD, 2009).
6.1.3 Hydrology/Water Quality	Section 6.1.3 Hydrology/Water Quality was updated to reflect the County's current SUSMP (2008) and the project's SWMP (Fusco, 2009).
<b>6.2 Effects Found not to be Significant During Initial Study</b>	
6.2.2 Transportation/Traffic	Section 6.2.2 Transportation/Traffic was updated to reflect the 2009 traffic study update (Linscott, Law & Greenspan).
6.2.4 Public Services	Section 6.2.4.2 Fire Protection was revised to clarify emergency response times.
<b>7.0 List of References</b>	Updated to reflect updated technical studies
<b>8.0 List of EIR Preparers and Persons and Organizations Contacted</b>	Updated to reflect current EIR preparers
<b>9.0 List of Mitigation Measures and Environmental Design Considerations</b>	Updated to reflect changes in mitigation measures for biology, hazards and hazardous materials, and water quality.

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